

1 BETSY C. MANIFOLD (182450)
2 RACHELE R. BYRD (190634)
3 ALEX J. TRAMONTANO (276666)
4 **WOLF HALDENSTEIN ADLER**
5 **FREEMAN & HERZ LLP**
6 750 B Street, Suite 1820
7 San Diego, CA 92101
8 Telephone: (619) 239-4599
9 Facsimile: (619) 234-4599
manifold@whafh.com
byrd@whafh.com
tramontano@whafh.com

7
8 *Attorneys for Plaintiff*

9 [Additional Counsel on Signature Page]

10 **UNITED STATES DISTRICT COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**

12 ROBERT LALOR, derivatively on behalf of
13 PAYPAL, INC.,

14 Plaintiff,

15 v.

16 DANIEL H. SCHULMAN, JOHN D. RAINY,
17 RODNEY C. ADKINS, JONATHAN
18 CHRISTODORO, JOHN J. DONAHOE, DAVID
19 W. DORMAN, BELINDA J. JOHNSON, GAIL J.
MCGOVERN, DEBORAH M. MESSEMER,
DAVID M. MOFFETT, ANN M. SARNOFF,
FRANK D. YEARY, and WENCES CASARES,

20 Defendants,

21 and

22 PAYPAL HOLDINGS, INC.,

23 Nominal Defendant.

Case No. 5:22-cv-00370

24
25
26
27
28 **NOTICE OF ERRATA REGARDING**
MISSING EXHIBIT TO VERIFIED
SHAREHOLDER DERIVATIVE
COMPLAINT

1 **TO THE COURT, ALL PARTIES, AND THEIR RESPECTIVE ATTORNEYS OF**
2 **RECORD:**

3 **PLEASE TAKE NOTICE** that the Verification to Plaintiff Robert Lalor's Verified
4 Shareholder Derivative Complaint (ECF No. 1) (the "Complaint") was inadvertently omitted.
5 Plaintiff intended to file the attached Verification as Exhibit A to the Complaint and files this Notice
6 of Errata and the Verification as Exhibit A hereto to correct the error.

7 DATED: January 19, 2022

**WOLF HALDENSTEIN ADLER
FREEMAN & HERZ LLP**

8
9 By: /s/ Rachele R. Byrd
10 RACHELE R. BYRD

11 BETSY C. MANIFOLD (182450)
12 RACHELE R. BYRD (190634)
13 ALEX J. TRAMONTANO (276666)
14 750 B Street, Suite 1820
15 San Diego, CA 92101
16 Telephone: (619) 239-4599
Facsimile: (619) 234-4599
manifold@whafh.com
byrd@whafh.com
tramontano@whafh.com

17 **MOORE KUEHN, PLLC**
18 Justin A. Kuehn
Fletcher W. Moore
30 Wall Street, 8th floor
19 New York, New York 10005
Tel: (212) 709-8245
jkuehn@moorekuehn.com
fmoore@moorekuehn.com

20
21 **RIGRODSKY LAW, P.A.**
22 Seth D. Rigrodsky
Timothy J. MacFall
23 Vincent A. Licata
825 East Gate Boulevard, Suite 300
24 Garden City, NY 11530
Tel: (516) 683-3516
sdr@rl-legal.com
tjm@rl-legal.com
vl@rl-legal.com

25
26
27 *Attorneys for Plaintiff*

28
NOTICE OF ERRATA REGARDING MISSING EXHIBIT TO
VERIFIED SHAREHOLDER DERIVATIVE COMPLAINT
CASE NO. 5:22-CV-00370

EXHIBIT A

VERIFICATION

I, Robert Lalor, have reviewed the allegations made in this Verified Shareholder Derivative Complaint, know the contents thereof, and authorize its filing. To those allegations of which I have personal knowledge, I believe those allegations to be true. As to those allegations of which I do not have personal knowledge, I rely upon my counsel and their investigation and believe them to be true. I further declare that I am a current holder, and have been a holder, of PayPal Holdings, Inc. common stock at all relevant times.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this _____ day of January 2022.


ROBERT LALOR (Jan 17, 2022 10:16 EST)

ROBERT LALOR